

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
GREENSBORO DIVISION**
Civil Action No. 1:11-cv-0129

JIHUI ZHANG,

Plaintiff,

v.

FEDERATION OF STATE MEDICAL
BOARDS, NATIONAL BOARD OF
MEDICAL EXAMINERS, and
PROMETRIC,

Defendants.

**MOTION FOR EXTENSION OF
TIME**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendant National Board of Medical Examiners (“NBME”) respectfully moves the Court for an order extending its time to answer or otherwise respond to Plaintiff’s Complaint in the above-referenced action to and including April 17, 2011. In support of its motion, and as good cause, NBME shows unto the Court the following:

1. This *pro se* action was filed on or about February 18, 2011.
2. NBME was served with a copy of a Summons and Complaint on February 25, 2011.
3. The time to answer or otherwise respond has not expired, no prior extensions of time have been obtained, and NBME’s counsel requires additional time within which to investigate this matter and prepare a responsive pleading.
4. This Motion is made in good faith and not for the purpose of delay.

WHEREFORE, Defendant National Board of Medical Examiners respectfully requests an extension of time through and including April 17, 2011, in which to serve its answer or other response to Plaintiff's Complaint.

This the 15th day of March, 2011.

/s/Jon Berkelhammer

Jon Berkelhammer

NC Bar No. 10246

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*Attorney for Defendants Federation of State
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Medical Examiners*

CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and I hereby certify that I have mailed the document to the following non CM/ECF participant:

JIHUI ZHANG
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CHAPEL HILL, NC 27516

/s/Jon Berkelhammer
Jon Berkelhammer
*Attorney for Defendants Federation of State
Medical Boards and National Board of
Medical Examiners*